

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

TAMECA S. HILL
RAYMELL C. MOORE,

Plaintiffs,

XAVIER BECERRA, SECRETARY OF THE
DEPARTMENT OF HEALTH AND HUMAN SERVICES,

WISCONSIN DEPARTMENT OF HEALTH SERVICES,
UNITED HEALTH CARE INSURANCE COMPANY

Involuntary Plaintiffs,

v.

Case No. 24-CV-737

PROGRESSIVE UNIVERSAL INSURANCE CO,
BRIAN YOUNG, RICHARD TOLENTINO [Squad 3284],
JEFFREY JOPP, ALEXANDER VERREAULT [Squad 3281],
SHAUNDAE McINTOSH, and STEVEN MENGE [Squad 7280],
CITY OF MILWAUKEE,
JOHN DOE (Unknown Driver),
EDWARD THOMAS,
XAVIER HAYES,
KEJUAN PEREZ,
TREVON MALONE,
and EARNEST JULIEN,

Defendants.

NOTICE OF REMOVAL

TO THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF WISCONSIN

The petition of defendants, respectfully shows as follows:

1. On February 16, 2024, an action was commenced against petitioners in the Circuit
Court for Milwaukee County, Wisconsin entitled *Tameca S. Hill, et al. v. Progressive Universal*

Insurance Co, et al., Case No. 24-CV-001367, by the filing with the court of a summons and complaint. True copies of these documents are annexed hereto.

2. The above-described action is a civil action of which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1331 and 42 U.S.C. § 1983, and pendent jurisdiction, and is one which may be removed to this Court by the petitioners, defendants therein, pursuant to the provisions of 28 U.S.C. § 1441(a) and (c), in that, as appears from the complaint, this is a civil action asserting a claim arising under a law of the United States, 29 U.S.C. 201 et. Seq. 207 (o)5, and 216(b).

3. That the summons and complaint in the above-captioned matter were purportedly served upon defendants Steven Menge and Brian Young as well as upon Richard Tolentino and Alexander Verreault within thirty days of making this petition, on May 13, 2024 and May 20, 2024 respectively.

WHEREFORE, the petitioners pray that the above-described action, now pending against Brian Young, Steven Menge, Richard Tolentino, and Alexander Verreault in the Circuit Court for Milwaukee County, Wisconsin, be removed therefrom to this court.

Dated and signed at Milwaukee, Wisconsin this 12th day of June, 2024.

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